

1 Thomas E. Hill (State Bar. No. 100861)
2 Thomas.Hill@hklaw.com
3 Kristina S. Azlin (State Bar. No 235238)
4 Kristina.Azlin@hklaw.com
5 John H. Haney (State Bar. No 299970)
6 John.Haney@hklaw.com
HOLLAND & KNIGHT LLP
400 South Hope Street, 8th Floor
Los Angeles, CA 90071
Telephone: 213.896.2400
Fax: 213.896.2450

*Attorneys for Defendant,
Society For Human Resource Management*

REBECCA WILLIFORD (she/her) – CA BAR NO. 269977
rwilliford@dralegal.org
MEREDITH J. WEAVER (she/her) – CA BAR NO. 299328
mweaver@dralegal.org
EMILY SEELENFREUND (she/her) – CA BAR NO. 804482 (Registered Legal Services Attorney) eseelenfreund@dralegal.org
Disability Rights Advocates
2001 Center Street, 4th Floor
Berkeley, California 94704-1204
Tel: (510) 665-8644
Fax: (510) 665-8511

5 | Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

1 TIFFANY RUFFA, KATHRYN CANFIELD,
2 and ISIDORE NIYONGABO, on behalf of
themselves and all others similarly situated,

Plaintiffs,

4 | V.

5 | SOCIETY FOR HUMAN RESOURCE MANAGEMENT,

6 Defendant.

Case No. 4:21-cv-05549-DMR

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT**

Complaint Filed: July 20, 2021

Current Response Date: January 10, 2022

New Response Date: March 15, 2022

1 Plaintiffs Tiffany Ruffa, Kathryn Canfield, and Isidore Niyongabo (“Plaintiffs”) and
2 Defendant Society for Human Resource Management (“Defendant”), by and through their
3 respective counsel, jointly stipulate to extend the time for Defendant to respond to the Complaint
4 from January 10, 2022 to March 15, 2022.

5 This stipulation is made in good faith and not for the purpose of causing unwarranted
6 delay. Good cause supports the extension because (i) only two prior extensions have been
7 obtained, pursuant to ongoing settlement discussions, (ii) the Parties engaged in a Settlement
8 Conference on October 20, 2021, are continuing to engage in good faith settlement negotiations,
9 and have scheduled a mediation for March 1, 2022, and (iii) the Parties are complying with this
10 Court’s General Order 56 and the Court’s scheduling order in this case (Dkt. No. 5). Further,
11 pursuant to Local Rule 6-1(a), this extension will not alter the date of any event or any deadline
12 already fixed by Court order.

13 IT IS SO STIPULATED.

14 DATED: January 7, 2022

HOLLAND AND KNIGHT LLP

15 By: /s/ John H. Haney
16 Thomas E. Hill
17 Kristina S. Azlin
John H. Haney

18 *Attorneys for Defendant*

19 DATED: January 7, 2022

DISABILITY RIGHTS ADVOCATES

20 By: /s/ Emily Seelenfreund
21 Emily Seelenfreund
22 Meredith J. Weaver
Rebecca Williford

23 *Attorneys for Plaintiffs*

24 **ATTESTATION OF CONSENT**

25 I hereby attest that all other signatories listed, and on whose behalf the filing is submitted,
26 concur in the filing’s content and have authorized the electronic filing of this document with
27 their signature.

28 DATED: January 7, 2022

By: /s/ John H. Haney